

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

Civil No. 19-2875 (RBK/JS)

This Document Relates to:

All Actions

STIPULATED ORDER EFFECTUATING AGREEMENT
REGARDING ESI SEARCH TERMS PERTAINING TO THE ZHP DEFENDANTS

THIS MATTER HAVING COME before the Court on Defendants' Motion to Modify the ESI Search Terms (Dkt. 445); and

THIS COURT HAVING CONSIDERED the parties' submissions in support of and in opposition to said Motion, as well as the argument and representations of counsel made during the telephonic status conference on June 17, 2020,

IT IS HEREBY ORDERED, this the 24th day of June 2020, as follows:

1) Based on affirmations from counsel that an agreement has been reached to resolve the parties' current dispute concerning ESI search terms, the Defendants' Motion to Modify the ESI Search Terms is **DENIED AS MOOT** with respect to Torrent Pharmaceuticals, Ltd., and Torrent Pharma, Inc. ("Torrent");

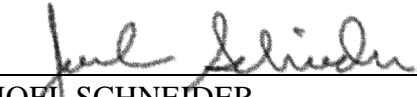
2) For purposes of effectuating and memorializing the agreement reached between Plaintiffs and Torrent, and based on the agreement between Plaintiffs and Torrent, the Court **STATES FURTHER:**

a. Torrent will search the custodial records of their custodians using the search terms contained in, and in the manner described in, Exhibit H to the December 23, 2019 Order (Dkt. 328 at 29-57, the "December 23 Order"), except that they will

apply the agreed modifications to those search terms set forth in Exhibit 1 to this Stipulated Order and, should the need arise from either party, make additional mutually agreed-to discrete modifications without Court intervention and as long as such modifications do not result in a delay of document production;

b. In addition to the above, the parties will proceed in accordance with the ESI Protocol (Dkt. 125), as well as their representations and the Court's instructions made during the June 17, 2020 status conference, to resolve issues through the meet and confer process, if any, that might arise during the processing, review, and production of Torrent's ESI.

SO ORDERED.



JOEL SCHNEIDER
United States Magistrate Judge